

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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U.S. DISTRICT COURT
DISTRICT OF MASS.

JONATHAN MULLANE,)
Plaintiff,)
)
and)
)
E. PETER MULLANE,)
(Proposed) Plaintiff-Intervenor,)
)
v.)
)
FEDERICO A. MORENO, et al.)
Defendants.)

Docket No. 1:18-CV-12618

**JOINT MOTION OF PLAINTIFF JONATHAN MULLANE AND
(PROPOSED) PLAINTIFF-INTERVENOR E. PETER MULLANE
FOR REASSIGNMENT TO AN OUT-OF-CIRCUIT DISTRICT COURT JUDGE
PURSUANT TO 28 U.S.C. § 292(d)**

NOW comes the Plaintiff Jonathan Mullane and (Proposed) Plaintiff-Intervenor E. Peter Mullane (collectively, herein the "Plaintiffs") in the above-entitled action, and in anticipation of filing a post-judgment Motion pursuant to Rule 60 of the Fed. R. Civ. P., respectfully request that this case be reassigned to an out-of-circuit District Court judge.

In support hereof, the approval of such an order of the court is most appropriate in these factual circumstances, as stated in pertinent part in 28 U.S.C. § 292(d):

(d) The Chief Justice of the United States may designate and assign temporarily a district judge of one circuit for service in another circuit, either in a district court or court of appeals, upon presentation of a certificate of necessity by the chief judge or circuit justice of the circuit wherein the need arises.

Id.

In accordance therewith, the Plaintiffs further state in support hereof that they shall submit to this Court any and all additional supporting documentation as may be required for the approval of this instant motion, and upon such appropriate terms and times as the Court may order.

Respectfully submitted,

/s/ E. Peter Mullane, Esq.
E. PETER MULLANE, ESQ.,
Proposed Plaintiff-Intervenor,
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DATED: May 11, 2025

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this filing submitted via the CM/ECF system shall be transmitted electronically to the registered participants as identified on the Notice of Electronic Filing ("NEF"), and that paper copies shall be mailed via first class mail, postage prepaid, to those indicated as non-registered participants on the date of filing.

DATED: May 11, 2025

/s/ E. Peter Mullane, Esq.
E. PETER MULLANE, ESQ.